

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

2020 DEC -2 PM 2:17

CLERK

BY KP  
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UNITED STATES OF AMERICA,

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)

)

v.

)

Crim. No. 2:20-cr-104-1

)

BRADLEY LEFEBVRE

)

(18 U.S.C. § 2261A)

Defendant.

)

INDICTMENT

COUNT 1

The grand jury charges:

Beginning in approximately March 2020 and continuing until August 7, 2020, in the District of Vermont, the defendant BRADLEY LEFEBVRE, with intent to harass and intimidate J.C. Jr., used facilities of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to J.C. Jr., immediate family members of J.C. Jr., and a spouse and intimate partner of J.C. Jr.

(18 U.S.C. § 2261A(2)(B))

**COUNT 2**

Beginning in approximately April 2020 and continuing until August 7, 2020, in the District of Vermont, the defendant BRADLEY LEFEBVRE, with intent to harass and intimidate J.C. Sr., used facilities of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to J.C. Sr., immediate family members of J.C. Sr., and a spouse and intimate partner of J.C. Sr.

(18 U.S.C. § 2261A(2)(B))

COUNT 3

Beginning in approximately April 2020 and continuing until August 7, 2020, in the District of Vermont, the defendant BRADLEY LEFEBVRE, with intent to harass and intimidate M.A., used facilities of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to M.A., immediate family members of M.A., and a spouse and intimate partner of M.A.

(18 U.S.C. § 2261A(2)(B))

A TRUE BILL

  
FOREPERSON *[Signature]*

*Christina E. Nolan*

CHRISTINA E. NOLAN (GLW)  
United States Attorney

Rutland, Vermont  
December 2, 2020